



WASHINGTON STATE DEPARTMENT OF ECOLOGY

Spill Prevention, Preparedness and Response

Operations Manual Review Guide for Class 1 and Class 2 Facilities

Preface

The Spills Prevention Section has prepared this guidance document to:

- Help Facility owners and operators comply with the Facility Oil Handling Standards Rule (Chapter 173-180 WAC) and understand what Ecology looks for in an operations manual.
- Help Ecology be consistent in the review and approval of operations manuals.

The rule requires Class 1 (refineries and bulk storage terminals that transfer oil as cargo) and Class 2 (mobile oil deliverers) to prepare an operations manual (manual). The manual documents how a facility's staff will safely conduct oil transfers for all types of oil and conditions encountered.

This guidance is based on the language of the rule for Class 1 facilities, with additional information and detail. Content for Class 2 facilities operations manuals is nearly the same and included in this guide. The parts that do not apply to Class 2 facilities will be marked as such.

If you need this publication in an alternative format, please call Spills Program at 360-407-7455. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

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Part 1: Manual Preparation and Format Requirements

➤ U.S. Coast Guard (USCG) Review of the Operations Manual:

If you are required to submit your operations manual to the USCG, you must submit your operations manual to both Ecology and the USCG for approval. We work with the USCG to encourage the highest level of care for oil transfers.

Our regulations are very similar to the USCG's for marine terminal operations. If we have a concern about some part of the operations manual, the USCG could, too. Or, the USCG might want to know about our concerns if it could affect how they review the manual. Your manual may already be examined and stamped by the USCG before it is submitted to Ecology.

➤ Format of the Manual:

The rule doesn't specify the exact layout of your operations manual. Instead, it allows you to design it to maximize its usefulness to your operators.

A detailed table of contents will help us locate the required material in the manual. Topics in the table of contents should be cross-referenced with your facility spill prevention or contingency plans and your USCG operations manuals, as appropriate.

The rule requires you to keep your manual updated, both at your facility and in the copies we keep. Each manual must contain a log sheet, showing the date of each change, the nature of the change, and the person responsible for submitting the information. For a paper version, the manual must be formatted so it is easy to put in new pages, such as a three-ring binder. We encourage you to submit electronic copies of your manual.

Part 2: Manual Content for Class 1 and Class 2 Facilities

➤ General Considerations:

- The operations manual serves several functions. It is a reference document for daily use, a training document for operators, and communicates information required by the rule. Your operators should be able to pick up the manual and look up the details for oil transfer procedures. The detailed procedures can be a part of the body of the manual, or can be included as attachments.
- Your manual must include enough detail so we can see if the operation of your facility meets requirements of the rule and minimizes the risk of oil spills.

➤ Submittal Agreement:

- **Purpose:** The Submittal Agreement attests to the accuracy of your operations manual, and commits the owner/operator's resources to its implementation. In other words, the Submittal Agreement binds you to operate your facility as outlined in your operations manual.
- **Responsible Official:** The person who signs the Submittal Agreement must be a person who has authority to direct the operation of the facility, and can authorize funds to do so in accordance with the manual.

At a minimum, the Responsible Official should have legal responsibility for expenses necessary to operate the facility. If the facility is owned by a corporation, the Responsible Official must be able to bind the corporation to implementation of the operations manual.

- **Content:** The Submittal Agreement must clearly identify the following:
 - Name of the facility
 - Name of the owner/operator
 - Physical address of the facility
 - Start date of transfer operations from the facility
 - Nature of the facility. Is it a refinery, bulk storage terminal, mobile (Class 2) facility?

- A Class 2 facility must give the location of the base of operations, as well as locations of maintenance yards and headquarters (if different from base of operations).

➤ **General Facility Information - Class 1 and Class 2 Facilities**

- **Brief summary of Laws and Regulations:** Summarize the federal, state and local laws and regulations as they apply to the oil spill prevention and operations of your oil handling facility(ies).
- **Recordkeeping:** Include an extensive list of inspection and operations-related records and forms, such as watch logbooks, oil transfer records, and equipment inspection records. Describe where the records are located, and how long the records are retained.

We are particularly interested in records that show how oil transfer and storage equipment is inspected and maintained, especially for equipment that may remain in service for decades, like pipelines and aboveground storage tanks.

- **Maintenance and inspection schedules and procedures:** Include information about oil transfer equipment relating to inspection, maintenance, repair, replacement and record keeping (such as forms). Sources of this information should include equipment manufacturer's recommendations, industry standards and regulatory requirements. Your manual should describe the testing required for each hose assembly per 33 CFR 156.170 and indicate where the results of the latest tests are kept for inspection. It is important to cite sources so we can research the requirements.
- **Description of types of oil transferred:** List each type of oil you transfer, along with the physical properties of the oil and the precautions necessary for handling the oil.

Material Safety Data Sheets (MSDS) for each type of oil transferred are required to be onsite for a Class 2 facility. Emphasis should be placed on indicating which oils should not be pre-boomed when transferred.

- **Fire fighting procedures:** Specific, detailed information about how you will respond to fire for different oils should be in the manual. This will include the number of extinguishers, the type, and instructions for proper use.
- **Communications systems:** Include a description of each available communication device and procedures for their use between facility operators, vessel operators and regulatory agencies.

- **Transfer Monitoring devices:** Describe all of your transfer safety monitoring devices in detail. Include how the information gathered by the device is used in the facility's operation. Examples: "Hot eyes" for detecting fire, or floating spectrophotometers for detecting oil in the water.
- **Tank overfill protection:** WAC 173-180-420 and 460 requires facilities to comply with National Fire Protection Association (NFPA) Code 30-1993. This code requires tank owners to have formal written procedures for preventing tank overfill.

Describe how your facility prevents tank overfills, including but not limited to audible and/or visual high-level alarms, SCADA systems, or frequent tank gauging.

- How are the systems maintained and calibrated for accuracy?
- Do any of the overfill detection systems include an automatic shutoff?
- On the vessel side, how does the facility operator work with vessel operators to reduce the risk of overfill of vessel tankage?
- **Pre-booming and Alternative Measures:** Does your facility conduct **Rate A (greater than 500 gallons per minute (gpm))** transfers, **Rate B (500 gpm or less)** transfers, or both? Describe which rate categories you will be transferring under and if you have different methods to meet both rate requirements.

Rate A Transfers

- **Prebooming:** Include detailed procedures and equipment lists for full encirclement pre-booming of oil transfers, for maintaining the boom standoff from the vessel, and for retrieval of the boom after the transfer is complete.

Describe how you will deploy the remaining boom within one hour if a spill is detected. Does the manual contain enough information so we can determine if requirements of WAC 173-180-221(6) have been met?

- **Safe and Effective Threshold Value Report:** Include the safe and effective threshold values your facility will use to determine when to pre-boom (WAC 173-180-224). The rule requires you to determine the conditions under which the transfer can be safely and effectively pre-boomed.

This analysis must be reviewed and approved by Ecology. It can be a separate report included in the manual as an appendix. Guidance for reviewing the safe and effective threshold values analysis will be available under separate cover.

- **Ecology Boom Reporting Form:** Describe how and when you will submit the Ecology Boom Reporting Form to Ecology when it is not safe or effective to preboom a Rate A transfer. This requirement is found in WAC 173-180-221(3).
- **Alternative Measures:** Describe in detail how your facility meets the alternative measures required in WAC 173-180-221(7). Your facility must be able to deploy the alternative measures when it is not safe and effective to pre-boom the oil transfer.

Some of these measures must be kept onsite (containers for recovered oil, non-sparking scoops or shovels, and enough sorbents for a 7 barrel spill). Others must be available within defined timeframes after a spill is discovered (a spill tracking mechanism, boom and skimming equipment).

Rate B Transfers

- **Prebooming and Alternative Measures:** When your facility transfers at Rate B, you may either pre-boom (WAC 173-180-222(1)) or comply with the alternative measures requirements of WAC 173-180-222(2). Describe in your manual how you will meet the prebooming requirements, as well as the alternative measures when transferring at Rate B.

If you intend to preboom, include the appropriate details, procedures, and equipment lists for full encirclement pre-booming of oil transfers. Also include how you will meet the Rate B alternative measures. Does your manual contain enough information and detail so we can determine if the requirements of WAC 173-180-221(6) WAC have been met?

- **Equivalent Compliance Plan for Both Rate A and Rate B Delivers:** You may submit an equivalent compliance plan (WAC 173-180-070) for the alternative measures requirements. If you do, the plan should be included in your operations manual for review and approval with the rest of the manual. Check to make sure your proposed equivalent compliance measures meet the requirements of WAC 173-180-070.

The equivalent compliance plan should describe your proposal in detail and include supporting analysis. It should show how it provides as good or better protection as compared to the alternative measures.

Note: The equivalent compliance plan does not relieve your facility from the requirements WAC 173-180-221 and 222. You must still follow the prebooming requirements and employ some form of alternative measures. The plan is intended to give you an opportunity to propose alternative measures based on your local knowledge and expertise.

➤ **Facility Information required for Class 1 Facilities:**

- **Geographic information and physical facility information:** Describe your facility and the facility's location. Include these items:
 - A topographic map showing the facility location and drainage patterns.
 - A facility plot plan with locations of each part of the oil transfer system clearly identified.
 - Details about the number, length, diameter and route for the transfer pipelines.
 - Details about the dock/marine terminal, including at least decimal latitude and longitude, physical dimensions of the dock and causeway, mooring information (based on mooring analyses or industrial standards such as the International Safety Guide for Oil Tankers and Terminals), transfer locations, sizes, types and number of vessels that can be accommodated, and locations for safety equipment.
 - Detailed information about the tank farm, if applicable, such as tank sizing, roof systems, typical oils stored in each tank, presence of visible/audible alarms, and tank floor leak detection.
- **Facility operations schedules:** Does your facility transfer oil at any time 24/7, or do you operate under any time constraints, such as daylight hours only?
- **Leak detection methodology:** How do you meet or exceed the design standard of detecting an 8% leak from the transfer pipelines within 15 minutes? Do you have a way to detect leaks during both active transfers and static conditions when the pipelines are packed with oil? Include step-by-step procedures for the methodology you use.

If you use a computer-based monitoring system, include information on calibration, sensitivity, and how your operators respond to alarms. What will your facility use for a backup leak detection system if the primary one is out of service?

- **Surge/overpressure/water hammer protection for the transfer pipelines:** Describe how your facility protects the transfer pipelines from damage due to abrupt changes in pressure, especially during startup, shutdown or emergencies. Pressure relief valves, surge tanks and motor-actuated valves that open or shut over time against a pump's discharge pressure are common methods. Give details including:
 - At what pressures are the relief mechanisms set to operate?
 - Are these pressures less than the maximum allowable operating pressures for the particular pipeline?
 - How are the devices inspected, calibrated and maintained?
 - How do operators respond to an unexpected overpressure situation or alarm?
 - Include procedures to determine when transfer operations can safely resume after a surge/overpressure/water hammer event.
- **Facility information required for Class 2 Mobile Facilities:**
 - **Description of rolling stock:** Detail the capabilities of your fleet of rolling stock you use for oil transfers. Some of the details that should be provided are:
 - Make and age of stock.
 - Tractor-trailer combinations.
 - Gross vehicle weight of trucks and/or trailer combinations.
 - Tank capacities.
 - Pump capabilities.
 - Hose construction and connection.
 - **Locations of oil transfer operations:** List the various locations that oil transfer operations occur in each city or geographical location, if this information is not in the response plan required by WAC 173-180-730.

The list does not have to include every address, but must be localized enough to determine availability of resources for response activities. For example, you do not need to list "1712 Main Street" and "1718 Main Street." You can list "Main Street, City, WA 12345."

Provide information regarding the ability of the mobile facility to drive on various dock structures. Some dock structures cannot accommodate the full gross vehicle weight of the mobile facility. It is your company's duty to ensure the dock is strong enough to support the weight of your vehicles.

- **Leak detection procedures:** Describe the procedures your personnel will use to detect oil leaks during oil transfer operations.

➤ **Procedures for Oil Transfers to Non-Recreational Vessels– Class 1 and Class 2 Facilities:**

- **Vessel Compliance with Facility Requirements/Pre-Transfer Conference:** During the pre-transfer conference, the facility PIC and vessel PIC must exchange information about transfer procedures they will use.

Describe how your facility verifies the vessel operator meets the facility requirements for oil transfers. Is the information included in the Declaration of Inspection or in a separate checklist? Discuss transfer equipment compatibility, limitations, and methods you use to ensure a proper connection with the vessel.

WAC 173-180-235 and 33 CFR 156.120 detail the minimum items to discuss at the pre-transfer conference. However, we encourage you to add items that might increase the safety and efficiency of the transfer operation.

The pre-loading plan must be discussed as a part of the pre-transfer conference with the vessel PIC. Your manual should specifically give your PIC authority to refuse to begin the transfer if the vessel has withheld information, refused to correct deficiencies or failed to comply with the facility's instructions.

- **Operations Staffing:** Discuss the number of facility personnel involved in all types of oil transfers your facility does. Include each position's specific responsibilities, shift change procedures, information exchange and recording requirements.
- **Drip and Discharge Containment and Slop Oil Reception:** Describe how your facility deploys and operates the drip and discharge containment equipment. Both permanent and temporary measures should be discussed.

For mobile transfers, containment should be provided for spills from each hose connection needed to make a transfer, including the connection between the truck and the hose, and between sections of hose. How are any drips or spills stored and disposed of?

If the facility offers slop oil reception, describe the procedures to transfer slop oils.

- **Portable Lighting:** If your facility uses any portable lighting, include the procedures you use to shield the lighting in your manual.

- **Unexpected or Severe Weather and Sea Conditions:** Include in your manual your policies and procedures for actions to take in case of unusual or severe weather or sea conditions.

Determine the threshold values for weather and sea conditions at which your operators must modify or stop transfer operations. This analysis must be done for each location your facility transfers, if transfers occur at more than one location. The threshold values in your manual will be used to give site-specific guidance to your operators.

The supporting data for the threshold values must be available to us if we request it. It must include at least the following for each location:

- The instruments and/or methodology used to accurately measure and record current velocity, weather, and sea conditions in the facility's dock/vessel operations log book.
- Procedures for monitoring forecasted weather and sea conditions and communicating this information to the PICs at regular intervals.

When weather or seas exceed the threshold values and an oil transfer must be shut down, the manual must outline:

- Procedures for safely shutting down the transfer in adverse conditions.
- Communications procedures with the vessel.
- Criteria for vessels to depart the dock if conditions warrant.

Many factors need to be considered when establishing threshold values for each transfer location. Facilities should conduct mooring analyses or establish mooring requirements in accordance with acceptable industry standards for the safe berthing of various deadweight capacities of vessels at the dock(s). Other factors to consider include:

- Personnel safety.
- Limitations of the oil transfer equipment.
- Passing vessel effects.
- Change of vessel draft during delivery or receipt of oil.

Ecology recommends that when facilities develop the threshold values, they consider the worst case combined conditions that can be expected to be encountered.

- **Emergency Procedures:** Include the following emergency procedures and actions:
 - List of personal protective safety equipment and locations.
 - Procedures for responding to persons exposed to oil.
 - Initial oil spill response and containment, including the quantity, type, location, time limits, and instructions to access and deploy containment and recovery equipment; personal safety; available emergency shutdown devices and their locations and instructions.
 - How notifications are made to dispatchers, managers, emergency coordinators, and federal and state agencies. Include methods to communicate, devices to use, information to share, and contact information.

➤ **Procedures for Oil Transfers – Class 1 Facilities:**

- **Operating details for each hose system and/or loading arm:** If your facility uses loading arms for oil transfer operations, detail the capabilities and limitations of the loading arms, including but not limited to the size and type of connection, maximum lateral movement envelope, and extension limits and maximum operating pressure and temperature.

If your facility uses hose assemblies for oil transfer operations, include minimum design bursting pressure, maximum allowable working pressure, and the types and limitations of connections used.

The procedures for connecting the loading arms and/or transfer hoses to the vessel manifold should be detailed and specific to the types of transfer equipment used at the facility.

- **Simultaneous Transfers to Multiple Vessels:** If your facility can accommodate transfers to multiple vessels, detail the procedures for conducting simultaneous transfers, including increases in operating staff and special equipment required.
- **Startup:**
 - Include your facility's procedures to verify proper alignment of valves and pipelines.

- Does your facility conduct a “stand-up” pressure test before the start of a transfer to verify transfer pipeline integrity? If so, include the procedure for the test in your manual.
- Include your facility’s method to gradually increase transfer system pressure to verify the intended tanks are receiving oil at the intended rate, and all connections are liquid-tight.
- **Steady State and Topping Off:** Include your facility’s procedures for monitoring the leak detection system and/or receiving tank levels, topping off tanks, and switching receiving or delivering tanks.

Your manual should indicate how shift changes occur and how the information from the pre-transfer conference is communicated between personnel.

- **Shutdown:** The oil transfer shutdown procedures should address the gradual decrease of system pressure and flow rates, and the timing and sequence of valve closures.
- **Completion of Transfer:** When all oil is transferred, discuss how to:
 - Disconnect the hose systems or loading arms.
 - Drain the oil from them.
 - Blank the hose or loading arm to prevent residual oil from draining out.
 - Secure each transfer component.
- **Procedures for Class 1 Facilities that transfer to Transmission Pipelines:** The requirements for manual content for transfers to or from transmission pipelines are very similar to those required for vessel transfers. If your facility conducts both vessel and transmission pipeline transfers, the emergency procedures should make a distinction between the operational areas and requirements for each. Include how your facility prevents pipeline overpressure events.

Your manual must detail the following procedures:

- How to verify valve alignment and ensure the target receiving tanks have enough capacity.
- How to verify the intended tanks are receiving oil at the expected rate.
- Methods to monitor tank levels during steady state transfers.

- Methods to prevent tank overfills.
- Methods to top off tanks and switch between tanks.
- Transfer shutdown, including gradual decrease in pressure and flow rate, valve closure sequence and timing.

➤ **Procedures for Oil Transfers – Class 2 Mobile Facilities:**

- **Before the Transfer Begins:** Describe how your PIC conducts the pre-transfer conference.

Describe how the PIC prepares the transfer site (diverting traffic, signing, plugging storm drains, having response equipment available, etc.)

- **Making the Connections:** Include requirements in your manual to ensure a leak-free connection outlined in WAC 173-180-245. Describe the use of connections, gaskets, drip containment and recovery.
- **Startup:** The procedures should outline how to begin the oil transfer, with information on pump startup, gradual increase of pressure in the hoses, verification the intended tanks are receiving oil, and monitoring the transfer system for signs of leaks.

- **Steady state and Topping off:** Include directions for communicating with the vessel PIC about:

- Monitoring receiving tank levels.
- Topping off.
- Switching tanks.
- Changing the type of product delivered if multiple oils are involved.

If a shift change is anticipated or multiple trucks will deliver to a vessel, indicate how the changes will occur and how the information from the pre-transfer conference will be communicated to new personnel.

- **Shutdown:** Include your procedures for the end of the oil transfer operation, including gradual reduction of pressure and flow rates, pump shutdown and valve closure sequence and speed, draining residual product from hoses and blanking connections to prevent drips during hose retrieval.

Part 3: Manual Submittal and Review/Approval

➤ Kinds of Operations Manual Submittals:

- **New Operations Manual:** Facilities planning to begin oil transfer operations in Washington State must **submit an operations manual to Ecology at least 120 days before oil transfers over the water begin.** Facilities currently transferring oil in Washington waters that have never been subject to the Facility Oil Handling Transfer Rule must submit an operations manual to Ecology by February 25, 2007, or at least 120 days before a planned oil transfer over the water.
- **5-Year Re-approval:** The rule requires your facility to review its operations manual at least every five years to make sure the document still accurately reflects how oil handling operations are conducted. Significant changes to your manual must be submitted to Ecology for review and approval as they occur. However, smaller changes can accumulate over time making the manual more difficult to use.

The re-approval process is meant to encourage the facility owners/operators to carefully examine and compare the manual with actual operations of the facility. If your manual still accurately reflects your operations, you can send a letter to Ecology asking for the existing manual to be re-approved.

The updated manual or letter **must be submitted to Ecology 180 days before the previous approval expiration date.** You may continue to operate if an operations manual has been submitted to Ecology in compliance with the rule, but has not yet received full or conditional approval.

- **Significant change to the Operations Manual:** This guidance does not try to anticipate all types of changes that may be significant and require a plan update.

We encourage you to discuss changes with your Ecology plan manager prior to their implementation. This will help to determine if a change is “significant” and a plan update is required.

Changes to the manual **must be distributed to all manual holders and/or manual locations within 30 days of making the change to the manual.**

- **Ecology Review of the Operations Manual in response to a Spill, Drill or Inspection:** Your plan may be re-opened for review under certain circumstances.

- Oil spills at your facility are the most likely reason for your manual to be re-opened. Spill investigation findings may indicate changes in the operation of your facility are required to ensure prevention of future spills.
- We may also choose to re-open your manual if concerns are raised during a prevention inspection, an oil transfer inspection or a spill contingency drill. Under some circumstances, we may issue an administrative order to require you to re-submit with required changes by a certain date.

- **Completeness Review:** Before a full analysis of the submitted manual can begin, we will first conduct a completeness review. We check to ensure your manual addresses all of the topics required by the rule in sufficient detail and with enough supporting documentation.

If your manual is not complete, the Ecology engineer assigned to review your manual will send you written notice with instructions on additional information that must be submitted. Once your manual is complete, the detailed review will start.

- **Accuracy:** It may be necessary for Ecology to confirm certain aspects of the operations manual as a part of the review process. For Class 1 facilities, the operations manual is where we confirm the facility has met or exceeded the design standards (Chapter 173-180-300 to -340 WAC). We may conduct site visits, ask you to demonstrate the operation of the oil handling systems, or request additional information to complete the review process.

- **Approval:**

- The operations manual will be **approved** when:
 - The information in the manual presents a complete and accurate picture of the facility's operations.
 - For a Class 1 facility, the design standards are met or exceeded.
 - An operator can be trained from the manual.

- **Approval Letter:** We will send an approval letter to the responsible official for your facility. The letter will include the date of the approval, expiration date, and date the manual must be submitted for its next re-approval cycle.
- **Conditional Approval:** We may conditionally approve your manual if the information in it is not enough to determine if you meet the rule requirements, or if one or more of the design standards are not met. Conditional approval allows you more time to provide more information, or make changes to the facility and its operation so we can fully approve the manual.
 - We will notify you in writing if the manual is conditionally approved. We will include the reasons for the conditional approval and the needed actions to achieve full approval.
 - Your conditional approval may include **precautionary measures** to follow if we determine the manual's deficiencies increase your facility's risk of an oil spill. Precautionary measures are specific to the situation, but could include reduced operating pressures, additional staffing, or temporary backup systems.
 - **The rule allows you 30 days to correct deficiencies listed in your conditional approval letter.** We may negotiate a compliance schedule with you if the changes identified can not be implemented within 30 days. It may be necessary to formalize the compliance schedule in an administrative order.

➤ **Denial of Approval**

- Ecology will deny approval if you do not bring your operations manual into compliance. We will send you a letter explaining the reasons for the denial.
- If your manual is not approved, you may not continue to conduct over-the-water oil transfer operations.
- You have 90 days to resubmit your manual. You must respond to the reasons given for denial and incorporate any changes required in the denial letter.
- Ecology engineers must communicate early and often with their supervisor if a facility is having difficulty bringing its operations manual into compliance. It is important to consider strategies to ensure the facility is successful in achieving compliance.